



MONTGOMERY McCRAKEN

ATTORNEYS AT LAW

Robert E. O'Connor
New York Managing Partner

437 Madison Avenue
New York, NY 10022
Tel: 212-867-9500

Direct Dial: 212-551-7794
Mobile: 516-993-4471
Email: roconnor@mmwr.com

May 14, 2020

By ECF

Hon. Paul A. Engelmayer
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Hon. Alison J. Nathan
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Sai Marine Export Pvt Limited v. Maersk Line A/S*, Case No. 19 Civ 11364 (PAE)
Liberty Specialty Markets Limited v. Maersk, Inc., Case No. 19 Civ. 11373 (AJN)

Dear Judge Engelmayer & Judge Nathan,

The undersigned represents defendants Maersk Line A/S, Maersk, Inc., Maersk Line, Limited, and Maersk Line India Pvt Ltd. (collectively, the “Maersk” defendants) in the above-captioned cases. We write on behalf of Maersk as well as plaintiff *Sai Marine Export Pvt Limited* and plaintiff *Liberty Specialty Markets Limited* (collectively, the “Parties”) in connection with both cases to respectfully request adjournments of the initial pretrial conferences and related deadlines.

For your Honors’ information, Maersk has appeared and answered in *Sai Marine Export*, and an initial pretrial conference is presently scheduled for June 3, 2020. Maersk has appeared and answered in *Liberty Specialty Markets*, and an initial pretrial conference is presently scheduled for May 22, 2020. Meanwhile, the Parties’ *Consent Motion for Consolidation of Related Cases* (see, e.g., *Liberty Specialty Markets* at Docket No. 19) is pending. The Parties have already exchanged some claims documents and, after the consent motion for consolidation is decided, are prepared to efficiently move these related cases forward.

Please do not hesitate to contact the undersigned if you have any questions or comments.

MONTGOMERY McCRAKEN WALKER & RHOADS LLP

PENNSYLVANIA • NEW YORK • NEW JERSEY • DELAWARE

A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
JOHN J. LEVY, NEW JERSEY RESPONSIBLE PARTNER

Montgomery McCracken Walker & Rhoads LLP

May 14, 2020
Page 2

Kind Regards,

/s/ Robert E. O'Connor

Robert E. O'Connor

cc: *Counsel for Sai Marine Export*
Counsel for Liberty Specialty Markets

Granted. The May 22, 2020 initial pretrial conference is adjourned. The motion to consolidate has been granted, and instructions regarding the initial pretrial conference will follow in a separate order.

SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge

May 20, 2020